

ROBERT T. BROWNSON	:	IN THE
6101 Loch Raven Blvd., Apt. 212	:	CIRCUIT COURT
Pikesville, Maryland 21208	:	
v.	:	OF MARYLAND
	:	FOR BALTIMORE CITY
Plaintiff	:	
FENWICK APARTMENTS JOINT VENTURE	:	Case No:
DbA THE METROPOLITAN OF BALTIMORE	:	
SERVE ON:	:	
S. Randall Cohen, Resident Agent	:	
1127 Ivy Club Lane	:	
Landover, MD 20785	:	
Defendant	:	
:	:	
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:	:	

**COMPLAINT AND REQUEST FOR JURY TRIAL**

COMES NOW the Plaintiff Robert T. Brownson, by his attorneys, Samuel O. Cole and the Law Office of David Ellin, P.C. and sues Fenwick Apartments Joint Venture dba The Metropolitan of Baltimore (hereinafter referred to as "Defendant Corporation") and states as follows:

1. The Plaintiff is a resident of Baltimore City, Maryland.
2. The Defendant is a corporation which regularly conducts business in and around the State of Maryland, including Baltimore City.
3. The occurrence which is the subject of this lawsuit occurred in Baltimore City.
4. Venue is claimed in Baltimore City, Maryland.
5. On or about March 21, 2018, Plaintiff Brownson was carefully and lawfully walking to his vehicle, located in the parking lot of his apartment complex at 6101 Loch Raven Boulevard, Baltimore, MD 21239, which was at all times owned; controlled; maintained; and operated by the Defendant Corporation.

6. Suddenly and without warning, Plaintiff fell as the result of an untreated and unsalted walkway which was negligently allowed to remain in a dangerous and defective by agents; servants; employees; and/or servants of the Defendant Corporation.

7. As a result of the fall and negligence complained of hereinabove, the Plaintiff suffered significant and severe injuries which necessitated medical evaluation and treatment.

8. The Defendant Corporation through its agents, servants, and/or employees knew or should have known of the unsafe, hazardous, defective and dangerous condition existing in the parking lot and on the walkways, which it at all times through its agents, servants, employees and/or representatives owned, managed, and/or otherwise controlled on the day of the incident described hereinabove, and negligently failed to eliminate said dangerous conditions or to warn the Plaintiff or other residents or visitors of the existence of these conditions.

9. The Plaintiff's injuries were caused by the carelessness, recklessness and negligence of the Defendant Corporation in that it:

- a. failed to remove or correct the unsafe, dangerous and hazardous condition;
- b. failed to adequately inspect for dangerous conditions;
- c. failed to warn persons of the dangerous and unsafe conditions;
- d. allowed the property to be and remain in an unsafe and dangerous condition;
- e. failed to discover the presence of a dangerous condition; and
- f. was otherwise negligent and careless.

10. As a direct and proximate result of the Defendant Corporation's negligence, the Plaintiff was caused to sustain serious injuries to his person, severe shock to his nerves and nervous system, and great mental and physical anguish such that he will be and is prevented

from engaging in his usual activities, pursuits, and diminishing forever his former sense of well-being and mental health.

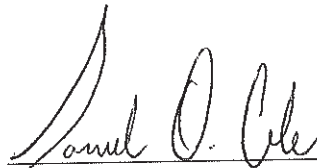
11. In addition, the Plaintiff Robert T. Brownson incurred medical expenses and other expenses.

12. As a direct and proximate result of the negligence of the Defendant Corporation, the Plaintiff suffered severe physical pain and emotional pain as well as economic losses, and claim is made against the Defendant Corporation herein by the Plaintiff for these damages and losses.

13. All of the injuries described hereinabove were caused solely by the actions of the Defendant Corporation with no negligence whatsoever on behalf of the Plaintiff Brownson.

WHEREFORE this suit is brought and the Plaintiff claims damages against the Defendant Fenwick Apartments Joint Venture dba The Metropolitan of Baltimore in an amount exceeding SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00).

Respectfully submitted,



Samuel O. Cole

CPF# 1612130108

[scole@ellinlaw.com](mailto:scole@ellinlaw.com)

Law Office of David Ellin

154 Westminster Pike

Reisterstown, MD 21136

(410) 833-0044

(410) 833-0442 FAX

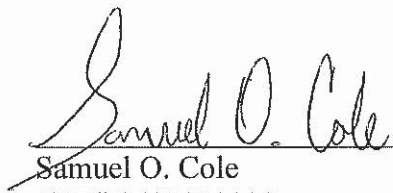
*Attorneys for the Plaintiff*

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**REQUEST FOR JURY TRIAL**

Plaintiff hereby requests a jury trial in this above-captioned matter.

Respectfully submitted,

  
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Samuel O. Cole  
CPF# 1612130108  
[scole@ellinlaw.com](mailto:scole@ellinlaw.com)  
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154 Westminster Pike  
Reisterstown, MD 21136  
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*Attorneys for the Plaintiff*